

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV
POLLUTION REPORT No. 18**

**Holtra Chem Chlor-Alkali Facility
One Industrial Drive
Riegelwood, Columbus County, NC**

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4930 Old Page Rd.
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DATE: May 15, 2003

I. BACKGROUND

Site No.:	A47J
Delivery Order No.:	N/A
Response Authority:	CERCLA
Incident Category:	State Referral
CERCLIS:	NCD097361018
NPL:	N
Site Category:	Industrial Chlor-alkali Facility
Responsible party:	Holtra Chem LLC, Honeywell Inc.

II. HISTORY

Refer to Action Memorandum, Consent Order, and previous POLREPs for site history.

III. SITUATION

Refer to initial and routine POLREPs for site situation.

IV. SITE ACTIVITIES

There was no EPA oversight of cleanup activities during the week of May 5 - May 8, 2003. OSCs were at mandatory training in Atlanta, Ga. OSC Fitzsimmons returned to the site on 5/14 and 5/15. START contractor continued to provide oversight assistance activities and air monitoring support.

Weather conditions for the most part were sunny with temps in the mid to upper 70sF. Rain was prevalent on 5/15/03.

May 05 thru May 08

* Cell cover removal, washing, disassembly and decontamination continued. Cell covers removed up to unit 17. Cell covers disassembled, washed and staged on the retort pad. Bed plates including cell 17 washed and elemental mercury reclaimed. HCl was washed throughout the bed plates and drained into the denuder boxes at the end castings. Mercury washing of debris continued. Two shipping containers totalling 44,000 metric tons of elemental mercury were generated. Structural steel support columns identified to be weak or suspect were braced for reinforcement purposes.

* Bleach plant demolition continued. The concrete structure has been razed down to the vat floor. Loose rebar was separated from concrete and loaded into rolloff. Concrete deemed non-contaminated was hauled to low area and used as fill west of the North Pond.

* Waste water pre-treatment continues. Over 40,000 gallons in three separate batches was treated during the week. An overflow line from the mess head tank was installed to discharge water into the cell building basement.

May 12 thru May 15, 2003

On May 01, 2003, EPA-Start contractor, at the direction of the OSC initiated an indoor command post/office area mercury sampling event. Samples were collected in the following locations 1) EPA office central hallway, 2) clock alley by entrance to large conference room, 3) dirty locker room, and 4) prep building. On May 15, 2003 results were returned as follows:

- 1) 930ng/m³
- 2) 1360ng/m³, duplicate: 1320ng/m³
- 3) 1900ng/m³
- 4) 18,000ng/m³

EPA Region IV's industrial/commercial removal action level is 25,000ng/m³. Site action level for continuous monitoring and potential upgrade to level C is also 25,000ng/m³.

EPA OSC met with Honeywell site supervisor and recommended that the measures be instituted to minimize exposures to URS staff, with the possibility that the prep building be vacated of URS supervisory/office support personnel and only be used intermittently for morning tailgate

briefings, until numbers can be reduced dramatically.

- * Cell cover removal is complete through cell #18. The bed plates have all been washed through cell #18.

- * Cooling tower dismantling completed this week.

- * The lines in the pipe rack between the bleach and product area (pipe rack F) have been removed. The pipe rack itself is scheduled to come down this week.

- * Potassium hydroxide spill (approx 3-4 gallons) leaked from a small tank near the product area. The spill was local to the concrete pad and was cleaned up with absorbent pads.

- * Cell building pit area was cleaned on Friday the 16th in an effort to minimize mercury vapors for the upcoming week. This activity was performed in Level B ppe.

General Air Monitoring Results

Mercury vapor levels in the cell building ranged from 0.003 to 0.280 mg/m³. The cell building basement had the higher range of numbers. The CRZ levels ranged between .0014 to .013 mg/m³, all less than action levels. Cooler temps assisted with keeping the levels down. The basement sump pit area and the cell pit continue to be Level B Work Zones due to elevated numbers. All other areas remain at level C work. Hg levels in the office bldg ranged from 565 - 797 ng/m³. The highest reading was in the clock alley area at 1400ng/m³. These levels as detected with the Lumex correlate nicely with the sample results as reported above thereby verifying the reliability of the Lumex instrument itself.

Ambient samples were not taken at the residential sampling locations due to the temps being low. However Lumex direct readout mercury vapor results ranged from <10 to 20 ng/m³, well below all action levels.

OSCs Fitzsimmons and Geraghty have initiated a personal mercury screening program designed to determine actual mercury exposure. Blood and urine screening is being performed at FOH facility both in RTP and Atlanta for both OSCs.

V. FUTURE ACTIVITIES

OSC Geraghty on site week of 5/19.

Continue cell cover removal and wash and dissassembly.

Commence dismantling of pipe rack F.

The next All-Hands Meeting is scheduled for 12:30 PM on Tuesday, May 28, 2003.

VI. DISPOSAL SUMMARY

Disposal Summary for Week of April 28, 2003			
Waste Stream	Disposal Destination	Quantity Shipped This Week	Quantity Shipped To Date
Hazardous - Micro	Waste Management - Emelle Treatment Facility Emelle, AL	none	(9) 25-yd boxes (2) 20-yd boxes
Hazardous - Macro (Including ACM Hazardous)	Waste Management - Emelle Treatment Facility Emelle, AL	none	(18) 20-yd boxes
D009 (Wastewater Filter Cake)	EQ - Michigan Disposal Waste Treatment Belleville, MI	one box (20,000lbs)	(4) box (est.90,000 lbs)
ACM (Non-Haz)	Anson Waste Management Facility Polkton, NC	Task Complete	(3) 40-yd boxes
Non-Haz Construction Debris	Sampson Co. Disposal Facility Roseboro, NC	two (30 yd box) 13,320 lbs	(10) 30-yd boxes 64,640lbs
Non-Haz Scrap Metal	Southern Metals Recycling Wilmington, NC	one box (30yds) 20,000lbs	(12) boxes 175,000lbs
Non-Haz Scrap Titanium	Southern Metals Recycling Wilmington, NC	none	none
Non-regulated material (Directly Landfilled)	Waste Management-Emelle Treatment Facility, Emelle, AL.	eight (25 yd box)	(17) 25 yard boxes
Non-haz scrap copper	Southern Metals Recycling Wilmington, NC	(1) 5yd box	(1) 5yd box
Reclaimed Elemental Mercury (for Reuse)	Goldsmith, Evanston, IL	none	(5) 1 ton cylinders